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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

10 ***

11 JOSEPH BARRESE,
12 Plaintiff,
13 vs.

14 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, DEPUTY CHIEF
15 RICHARD SUEY, in his individually and in
his official capacity; CORRECTIONS
16 OFFICER KEVIN GALE, individually and in
his capacity; DOES 1 through 10, individually
and/or in his official capacity; DOE
17 CORRECTIONS EMPLOYEES I through 10,
individually and/or in the official capacity;
18 ROE CORPORATIONS I through 10, Foreign
and/or Domestic Corporations,
19 Defendants.
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CASE NO. 2:18-cv-1671-KJD-GWF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(FIRST REQUEST)

21 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
22 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
23 ninety (90) days, up to and including September 3, 2019. In addition, the parties request that the
24 deadlines for expert disclosure, rebuttal expert disclosure, joint interim status report, dispositive
25 motions, and pretrial order also be extended as outlined herein. In support of this Stipulation and
26 Request, the parties state as follows:

27 1. On November 16, 2018, Plaintiff filed his first Amended Complaint in the United
28 States District Court, Clark County, Nevada.

1. Defendants will take the deposition of Plaintiff.
2. The parties will complete all written discovery.
3. The Plaintiff will take the depositions of the named Defendants.
4. The parties will take the depositions of any and all other witnesses garnered through discovery.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

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1 The following is a list of the current discovery deadlines and the parties' proposed
2 extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	June 5, 2019	Tuesday, September 3, 2019
Amendment to Pleadings	March 7, 2019	Closed
Interim Status Report	April 6, 2019	Friday, July 5, 2019
Expert Disclosure pursuant to Fed R. Civ. P. 26 (a)(2)	April 6, 2019	Friday, July 5, 2019
Rebuttal Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	May 6, 2019	Monday, August 5, 2019
Dispositive Motions	July 5, 2019	Thursday, October 3, 2019, or at least thirty (30) days after the close of discovery
Joint Pretrial Order	August 2, 2019	Monday, November 4, 2019, or at least thirty (30) days after the decision of last Dispositive Motions

15 This Request for an extension of time is not sought for any improper purpose or other
16 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient
17 time to conduct discovery in this case and adequately prepare their respective cases for trial.

18 This is the first request for extension of time in this matter. The parties respectfully submit
19 that the reasons set forth above constitute compelling reasons and good cause for the short
20 extension.

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WHEREFORE, the parties respectfully request that this Court extend the discovery period by ninety (90) days from the current deadline of June 5, 2019, up to and including September 3, 2019, and that the other remaining discovery dates also be extended as outlined in accordance with the table above.

Dated this 14th day of March, 2019.

Dated this 14th day of March, 2019.

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ORDER

IT IS SO ORDERED.

Dated this 15th day of March, 2019.

George Foley Jr.

UNITED STATES MAGISTRATE JUDGE